The frequency allocation 5250-5400 kHz should have a sub-band exclusively allocated for telegraphy and digital modes by virtue of the original request for the allocation; i.e. to provide effective communication during periods of low solar activity. these modes have proven their effectiveness with low power (Sec 315 Communications Act

of 1934) and simple antennas. Additionally, the rule of telegraphy on all frequencies within the bands allocated to the Amateur Service should be included de facto in the proposed allocation at 5250-5400 kHz, as it is in all current allocations. Sub-bands have worked effectively for many years, and to maintain continuity, should be included in the new allocation. Current conditions in the proposed allocation also support this view, as RTTY, fax, CW, and SSB, all coexist successfully in the commercial environment found within the proposed allocation.